

**IN THE
UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)
Plaintiff,)
)
v.) No. 17 CR 442
) Judge Elaine E. Bucklo
STEVEN MILLER,)
Defendant.)
)

AGREED MOTION TO TRAVEL

STEVEN MILLER, by the Federal Defender Program and its attorney IMANI CHIPHE, respectfully moves this Court to modify the order setting conditions of bond to permit him to travel to Southbend, Indiana. In support of this motion the defendant states as follows:

1. Mr. Miller was arraigned and entered a plea of not guilty to an information alleging violations of 18 U.S.C. §1343. Mr. Miller was released on an unsecured bond. As a condition of his bond Mr. Miller is not allowed to travel out the Northern District of Illinois without the Court's permission.
2. Mr. Miller requests permission to travel to Southbend, Indiana for a family weekend trip from July 29, 2017 to July 30, 2017.

3. The Pretrial Services Officer assigned to this case, Victor Alvarez, does not object to this request. In addition, Mr. Miller has provided Mr. Alvarez with an itinerary for his trip.

4. Counsel has contacted the Assistant United States Attorney assigned to this case, Renai Rodney, and he does not object to this request. Therefore, this motion is unopposed.

WHEREFORE, for all the reasons stated herein, Mr. Miller respectfully requests that this Court grant his motion and permit him to travel to Southbend, Indiana.

Respectfully submitted,

FEDERAL DEFENDER PROGRAM
Carol A. Brook
Executive Director

By: Imani Chiphe
Imani Chiphe
Attorney for Steven Miller

IMANI CHIPHE
FEDERAL DEFENDER PROGRAM
55 E. Monroe, Suite 2800
Chicago, IL 60603
(312) 621 - 2029

CERTIFICATE OF SERVICE

The undersigned, Imani Chiphe, an attorney with the Federal Defender Program hereby certifies that in accordance with FED. R.CIV.P5,LR5.5, and the General Order on Electronic Case Filing (ECF), the following documents(s):

AGREED MOTION TO TRAVEL

Was served pursuant to the district court's ECF system as to ECF filing, if any, and were sent by first- class mail/ hand delivery on **July 27, 2017**, to counsel/ parties that are non-ECF filers.

By: s/ Imani Chiphe
Imani Chiphe
FEDERAL DEFENDER PROGRAM
55 E. Monroe St., Suite 2800
Chicago, Illinois 60603
(312) 621- 2029